

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

JAMES C. SCHAEFER,

Plaintiff,

vs.

STOREX, B.V.,

Defendant.

Case No.

Hon.

COMPLAINT AND JURY DEMAND

James Moskal (P41885)
Warner Norcross & Judd LLP
Attorney for Plaintiff
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Plaintiff complains against defendant as follows:

1. This is an action for patent infringement under Title 35 of the United States Code as to which this Court has jurisdiction pursuant to 28 U.S.C. § 1338. Venue lies under 28 U.S.C. § 1400.

2. Plaintiff is a citizen of Kent County, Michigan. Defendant is a Netherlands corporation.

3. United States Patent No. 8,739,694 (copy attached as Exhibit A) was duly issued on June 3, 2014. Plaintiff is the owner of the patent by assignment.

4. Defendant has infringed the patent by making, selling, using or offering to sell control systems that embody the patented invention, and defendant will continue to do so unless enjoined by this Court.

5. Plaintiff has given defendant written notice of the infringement, and the infringement is willful.

WHEREFORE, plaintiff requests that the Court award plaintiff damages, enhanced damages, an injunction, interest, costs and attorney fees, and all additional relief to which plaintiff is entitled.

JURY DEMAND

Plaintiff demands a trial by jury.

WARNER NORCROSS & JUDD LLP

Dated: December 10, 2014

By: s/ James Moskal
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